

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION
CASE NO. 3:25CR 125-MOC

MAY 22 2025

US DISTRICT COURT
WESTERN DISTRICT OF NC

UNITED STATES OF AMERICA)

v.)

LUIS ZAMORA-CRUZ)
_____)

BILL OF INDICTMENT

Violations: 8 U.S.C. § 1306(b)
8 U.S.C. § 1326(a)

THE GRAND JURY CHARGES:

COUNT ONE

(ILLEGAL REENTRY BY AN ALIEN -- 8 U.S.C. § 1326(a))

On or about May 15, 2025, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, the defendant,

LUIS ZAMORA-CRUZ

an alien, was found in the United States after having been removed therefrom on or about July 6, 2010, at or near Del Rio, Texas, and on or about May 09, 2017, at or near El Paso, Texas, and not having obtained the express consent of the Secretary of Homeland Security to reapply for admission to the United States.

In violation of Title 8, United States Code, Section 1326(a).

COUNT TWO

(FAILURE TO NOTIFY ABOUT A CHANGE OF ADDRESS -- 8 U.S.C. § 1306(b))

On or about May 15, 2025, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, the defendant,

LUIS ZAMORA-CRUZ

an alien, failed to give written notice to the Attorney General of a change of his address within

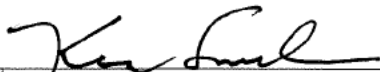
ten days from the date of such change, as required by 8 U.S.C. § 1305.

In violation of Title 8, United States Code, Section 1306(b).

A TRUE BILL: ✓

FOREPERSON

RUSS FERGUSON
UNITED STATES ATTORNEY



KENNETH M. SMITH
ASSISTANT UNITED STATES ATTORNEY